

EXHIBIT 1

FILED UNDER SEAL

1 UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF DELAWARE

3

4

5 D&M HOLDINGS INC., D/B/A THE)
6 D&M GROUP, D&M HOLDINGS U.S.)
7 INC.,)

8 PLAINTIFFS,)

9 VS.) C.A. NO.

10 SONOS, INC.,) 16-141 (RGA)

11 DEFENDANTS.)

12 _____)

13

14

15 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

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18 VIDEOTAPED DEPOSITION OF ARTHUR "TAD" L. COBURN, IV

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23 JOB NO. 112511

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REPORTED BY KIMBERLY EDELEN,

C.S.R. NO. 9042, CRR, RPR.

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1 VIDEOTAPED DEPOSITION OF ARTHUR "TAD" L. COBURN, IV,
2 TAKEN ON BEHALF OF THE PLAINTIFFS, AT 9:06 A.M.,
3 THURSDAY, OCTOBER 5, 2017, AT 533 STATE STREET,
4 SANTA BARBARA, CALIFORNIA, BEFORE
5 KIMBERLY A. EDELEN, C.S.R. NO. 9042, CRR, RPR.

6

7 APPEARANCES OF COUNSEL

8

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28 ALSO PRESENT: JIM LOPEZ, VIDEOGRAPHER

29 PAUL A. KAFADAR, SENIOR INTELLECTUAL
30 PROPERTY COUNSEL

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1 **Have you seen this document before?**

2 A Honestly, I can't recall.

3 **Q Okay. What is Play to Sonos?**

4 A I would say Play to Sonos is an earlier
5 term that we used which pretty -- pretty much
6 corresponds to the "DirectControl" term that I've
7 been using.

8 **Q Why did Sonos change the name from Play to**
9 **Sonos to DirectControl?**

10 MR. LEE: Objection to form.

11 THE WITNESS: I really don't know.

12 BY MR. QURESHI:

13 **Q Okay.**

14 A Marketing. Maybe. I'm sorry. That's
15 speculation. I -- I don't know.

16 **Q Did you prepare this document?**

17 A I don't believe so.

18 **Q Okay. If we could turn to Page 23 of the**
19 **document, not the Bates label -- not the Bates**
20 **number.**

21 A Okay.

22 **Q So there's a section in the top there**
23 **entitled, "Group Coordinator."**

24 **Do you see that?**

25 A Okay. This page also has "Sonos IDs used

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1 STATE OF CALIFORNIA)
2 COUNTY OF LOS ANGELES) ss.

3

4 I, Kimberly A. Edelen, C.S.R. No. 9042, in and
5 for the State of California, do hereby certify:

6 That prior to being examined, the witness named
7 in the foregoing deposition was by me duly sworn to
8 testify the truth, the whole truth and nothing but
9 the truth;

10 That said deposition was taken down by me in
11 shorthand at the time and place therein named, and
12 thereafter reduced to typewriting under my
13 direction, and the same is a true, correct and
14 complete transcript of said proceedings;

15 That if the foregoing pertains to the original
16 transcript of a deposition in a Federal Case, before
17 completion of the proceedings, review of the
18 transcript { } was { } was not required.

19 I further certify that I am not interested in
20 the event of the action.

21 Witness my hand this _____ day of _____,
22 20____.

23

24

25



KIMBERLY A. EDELEN, C.S.R. NO. 9042